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VIA ECFS

March 7, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest – Rate-of-Return Areas
E. Ritter Telephone Company**

Dear Ms. Dortch:

E. Ritter Telephone Company (SAC 401722) (Ritter) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America funding.¹ Ritter is a rate-of-return incumbent local exchange carrier serving rural areas of Arkansas, and proposes deployment as follows.

Located in the Mississippi River Delta in Northeast Arkansas, Ritter's service territory is primarily agricultural land. Ritter has made investments to provide broadband service to approximately 95% of its access lines. The Company has investigated the various ways to deliver reliable broadband with transmission speeds of at least 4 Mbps downstream/ 1 Mbps upstream to the remaining 5% and has determined that the most prudent way is to provide broadband over DSL. Without additional support like what is proposed in the Rural Broadband Experiment, individuals and small businesses located in these rural areas will not have access to broadband.

Proposed Service Area

Ritter proposes to build out broadband to approximately 270 unserved premises within its regulated service territory in Arkansas.

Proposed Broadband Service

Voice and Broadband services with broadband transmission speeds of 4 Mbps downstream/ 1 Mbps upstream provided over DSL.

¹ See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

Funding

Ritter estimates construction costs to be a total of \$2,000,000. Ritter requests this amount in funding from Connect America Funds in one-time funding and will fund the remaining capital and ongoing expenses to operate the system.

Ritter expects service to be offered to all unserved customers within two years after construction starts.

Ritter appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned at 870-336-2345 or john.strode@rittercommunications.com should you have any questions or need any additional information.

Sincerely,
RITTER TELEPHONE COMPANY

A handwritten signature in black ink, appearing to read "John Strode". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Strode".

John Strode
Vice President